

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

**FELIPE DE JESUS AVILA-SOTO,
FELIPE DE JESUS SUAREZ-PALAFOX,
And JUAN ALEJO HERNANDEZ-CANELA,
ON BEHALF OF THEMSELVES AND
OTHERS SIMILARLY SITUATED**

No: 6:24-cv-01392

JUDGE ROBERT R. SUMMERHAYS

V.

**MAGISTRATE JUDGE CAROL B.
WHITEHURST**

**SOUTH CENTRAL SUGAR CANE
GROWERS' ASSOCIATION, INC., AND
STERLING SUGARS, LLC**

**CORPORATE DISCLOSURE STATEMENT AND
CERTIFICATE OF INTERESTED PERSONS**

NOW INTO COURT, through undersigned counsel, come Defendants South Central Sugar Cane Growers' Association, Inc. and Sterling Sugars, LLC, appearing pursuant to Rule 7.1 of the Federal Rules of Civil Procedure solely for the purpose of this Disclosure Statement. Reserving all rights, motions, and defenses without waiver thereof, Defendants respectfully provide the following statement of corporate disclosure: South Central Sugar Cane Growers' Association, Inc. is structured as a nonprofit and is an entirely independent sugar cane grower association. It is comprised entirely of local sugar cane growers. Sterling Sugars, LLC is a wholly owned subsidiary of M.A. Patout & Son, LTD, LLC. Defendants further disclose that the following parties known to Defendants and their counsel have a financial interest in the outcome of this case:

1. Felipe de Jesus Avila-Soto, Plaintiff.
2. Felipe de Jesus Suarez-Palafox, Plaintiff.
3. Juan Alejo Hernandez-Canela, Plaintiff.
4. South Central Sugar Cane Growers' Association, Inc., Defendant.
5. Sterling Sugars, LLC, Defendant.
6. James M. Knoepp, Plaintiffs' counsel.

7. Daniel Davis, Plaintiffs' counsel.
8. Dawson Morton, Plaintiffs' counsel.
9. Brandon E. Davis, Defendants' counsel.
10. Marcellus D. Chamberlain, Defendants' counsel.
11. Jennifer Clewis Thomas, Defendants' counsel.

Respectfully submitted,

PHELPS DUNBAR LLP

/s/ Brandon E. Davis

Brandon E. Davis (La. Bar #29823)

Marcellus D. Chamberlain (*pro hac vice*)

Jennifer Clewis Thomas (*pro hac vice*)

365 Canal Street, Suite 2000

New Orleans, Louisiana 70130

Telephone: 504-566-1311

Facsimile: 504-568-9130

brandon.davis@phelps.com

marcellus.chamberlain@phelps.com

jennifer.thomas@phelps.com

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record/parties in this proceeding.

/s/ Brandon E. Davis

Brandon E. Davis (La. Bar #29823)